

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

ANA R. OLIVELLA RIVERA

Plaintiff

v.

POPULAR LEASING AND RENTAL, INC.,  
ET AL.

Defendants

-----\*

\* CIVIL NO.: 98-2267 (JAG)

\*

\*

\*

\*

\*

JURY TRIAL DEMANDED

\*

\*

\*

\*

\*

\*

MOTION REQUESTING LEAVE FOR COURT TO CONSIDER DOCUMENTS IN  
SPANISH FOR BRIEF TIME UNTIL TRANSLATION IS COMPLETED

TO THE HONORABLE COURT:

COME NOW defendants PREFERRED RISK INSURANCE COMPANY (erroneously denominated Puerto Rican American Insurance Company) and BANCO POPULAR DE PUERTO RICO, represented by the undersigned attorneys, and before the Honorable Court respectfully tenders this proposed pre-trial order:

1. In the present case, the appearing party filed a statement of uncontested facts in support of its amended motion for summary judgment on October 20, 2005. In support of said statement of uncontested facts, the appearing party filed several documents.

2. One of those documents was Exhibit 4 which consists of several pages of the deposition of plaintiff Ana R. Olivella taken on June 23, 1999.

3. Even though the deposition was taken in English, at certain points plaintiff answered in Spanish the questions that were posed to her in the deposition. Specifically, lines 22 to 23

of page 71 and lines 2 to 16 of page 72 are answers that were given in Spanish.

4. Said answers were referred to in support of the appearing party's contentions contained in the amended motion for summary judgment. We have already requested that said portions of the transcript of the deposition which are in Spanish be translated into the English language by a certified translator. However, due to health reasons, the undersigned attorney was out of the office and up to this date we have not yet received the above mentioned certified translation although they have already been given to the translator.

5. It is respectfully requested that this Honorable Court considers the above stated portions of the deposition in their original Spanish language until the certified translation is filed within the next few days. An extension of five (5) working days is respectfully requested to file said certified translation.

WHEREFORE, it is respectfully requested that this Honorable Court considers Exhibit 4 of the statement of uncontested facts on its original Spanish language until a certified translation into the English language is submitted no later than within the next five (5) working days.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Rafael A.**

**Oliveras López, Esq.**, and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: **David López Pumarejo, Esq.**, P.O. Box 195351, San Juan, Puerto Rico 00919-5351.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 25<sup>th</sup> day, of April, 2006.

s/ Ana María Otero  
USDC No. 206312  
Attorney for defendants  
Preferred Risk Insurance Company  
and Banco Popular de Puerto Rico  
OTERO & LOPEZ, L.L.P.  
P.O. Box 9023933  
San Juan, P.R. 00902-3933  
Tel: 724-4828  
Fax: 722-7662  
e-mail: [otelo@prtc.net](mailto:otelo@prtc.net)